

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

COMMON CAUSE, COMMON )  
CAUSE WISCONSIN, BENJAMIN R. )  
QUINTERO, )

*Plaintiffs,* )

v. )

ANN S. JACOBS, MARK L. THOMSEN )  
MARGE BOSTELMANN, JULIE M. )  
GLANCEY, ROBERT F. SPINDELL, JR., )  
and DEAN KNUDSON, in their official )  
capacities as Commissioners of the )  
Wisconsin Elections Commission, )  
MEAGAN WOLFE, in her official )  
capacity as the Administrator of the )  
Wisconsin Elections Commission, )

*Defendants.* )

**Case No. 19-cv-323**

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**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

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Pursuant to Fed. R. Civ. P. 56(c), Plaintiffs Common Cause, Common Cause Wisconsin, and Benjamin R. Quintero (collectively, "Plaintiffs"), by their attorneys Fair Elections Center and Pines Bach LLP, hereby move the Court to grant summary judgment in their favor: (1) declaring that WIS. STAT. §§ 5.02(6m), 6.79(2)(a), 6.86(1)(ar), and 6.87(1) violate the First and Fourteenth Amendments of the United States Constitution and 52 U.S.C. § 10101(a)(2)(B), to the extent they impose issuance date, expiration date, two-year expiration, and signature requirements on Wisconsin voters who use their college and university ID cards as voter identification; (2) enjoining the enforcement of the issuance

date, expiration date, two-year expiration, and signature requirements in WIS. STAT. §§ 5.02(6m), 6.79(2)(a), 6.86(1)(ar), and 6.87(1); and (3) awarding Plaintiffs their costs, expenses, disbursements, and reasonable attorneys' fees incurred in bringing this action pursuant to 42 U.S.C. § 1988.

As grounds for this motion, Plaintiffs respectfully represent that there are no issues of material fact in dispute and, therefore, that Plaintiffs' claims can be resolved as a matter of law. The grounds are more fully set forth in the Joint Stipulation of Facts, *see* dkt. 43, and the Brief in Support of Plaintiffs' Motion for Summary Judgment.

Respectfully submitted this 18th day of September, 2020.

/s/ Jon Sherman

Jon Sherman

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